

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
v.)	CRIMINAL NO. 13-10200-GAO
)	
DZHOKHAR TSARNAEV)	

**ASSENTED-TO MOTION TO ENLARGE TIME FOR
FILING RESPONSES TO GOVERNMENT’S MOTIONS FOR NOTICE UNDER
FED. R. CRIM. P. 12.2 AND FOR DEFENSE AUTOMATIC DISCOVERY**

Defendant, Dzhokhar Tsarnaev, by and through counsel, and with the assent of the government, hereby moves this Court to enlarge the time for filing his responses to the government’s Motion for Notice Pursuant to Fed. R. Crim. P 12.2(b), DE 242, and Motion to Compel Compliance with Automatic Discovery Obligations, DE 245, from April 25 to May 9.

As grounds for this motion, undersigned counsel state that the parties plan to confer in an effort to arrive at an agreed-upon schedule for the filing of Notice under Fed. Crim. P. 12.2, expert disclosures from both parties, and defense automatic discovery. They will, of course, comply with the Court’s order, issued yesterday, directing the parties to file proposed schedules by April 30. In the event that the parties cannot reach agreement, however, the defense wishes to have an opportunity to file responsive pleadings.

Dated: April 25, 2014

Respectfully Submitted,
DZHOKHAR TSARNAEV
By his attorneys

/s/ William W. Fick

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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 25, 2014.

/s/ William Fick